

E-ID Mad Dog Meeting Minutes

FFEL Community and SFA PIN Use

3/13/01 11:00 – 12:30 Portals 6th Floor Main Conference Room

Attendees	FFEL Community ; SFA; and NCS Pearson representatives. (See attached list for names.)
Purpose	<p>To provide a forum to exchange information between the FFEL Community and SFA on:</p> <ul style="list-style-type: none"> • How SFA envisions FFEL use of a SFA PIN authentication service • Status of SFA discussions with a service provider • FFEL Community expectations, requirements, and interest in using the SFA PIN • SFA discussion of proposed DL model
Outcome	<ul style="list-style-type: none"> • NCS Pearson will distribute SFA PIN Use technical specifications and initial estimates of transaction costs by first week of April. • SFA and FFEL Community should meet to collaboratively develop industry standards for a digital document that stores data elements needed to support the eNote eSignature • FFEL Community would provide input to facilitate the drafting of Service Level Agreements and Performance Standards for any Lender/Authentication service provider.
Topics Covered	<p>Direct Loan Proposed E-signed eMPN Process</p> <p>Neil explained a handout that summarizes the components of their enforceable Direct Loan eMPN and stepped through the proposed DL websites for a student to e-sign a Direct Loan eMPN. Questions from the FFEL Community follow:</p> <ol style="list-style-type: none"> Q: What happens when the student doesn't have an SFA PIN or the PIN doesn't authenticate? A: Student is redirected to a site of the lender's choosing that says you need to get a PIN or your PIN isn't working. Q: How does SFA authenticate a student for PIN issuance? A: With the Social Security Administration Q: What is the value of storing the different borrower clicks? A: Becomes corroborating evidence to support non-repudiation of the loan and fulfills E-SIGN requirements that the signature is a <i>symbol</i> and a <i>process</i>. Q: What SFA PIN authentication data is SFA storing? A: Date/time of PIN authentication and client/lender code Q: Have you considered using XML object passing so the SFA PIN website never shows itself? A: Yes. It can be made to appear that to the student that they haven't left the lender website during the process. This brings up the consideration of how many websites does SFA want their PIN information collected on. Q: What will your system response time be? A: Internet response time or faster if the lender has their own pipe to the SFA PIN site <p>Standards for Digital Document</p> <p>FFEL was interested in knowing exactly what process steps SFA would be storing for their digital document, what format they would be using, and whether FFEL would be required to store the exact data SFA will be storing. FFEL mentioned their work in XML standards, and it was decided SFA and the FFEL Community should collaborate on an industry digital document standard. The sooner FFEL receives specifications, the sooner they can decide on using the SFA PIN.</p>



	<p>Service Level Agreement (SLA) NCS Pearson explained that a Service Level Agreement would be developed with each customer of the SFA PIN site. Issues like client codes, desired level of SSL encryption, use of private pipes to SFA PIN site, etc., would be included. Access to the SFA PIN site will require a browser that supports SSL. Backup and recovery performances. Turnaround time of internet v dedicated line.</p> <p>Legal Agreements Contracts will be needed between:</p> <ol style="list-style-type: none"> 1. CSC/NCS 2. Lender/NCS 3. SFA/NCS <p>Lender/Service Codes The authentication service provider needs to include a client code, a lender code and a servicer code within their PIN authenticated data. FFEL already has lender and servicer IDs, and can work with NCS Pearson in the SLAs to utilize the existing codes. Lender and servicer codes will be stored as part of audit history.</p> <p>Cost and Volume NCS wanted to know the volume of eNotes. FFEL Community wanted to know what the expected transaction costs would be. It was agreed that it is difficult to accurately estimate volume, and that FFEL use of the SFA PIN, hence volume numbers, depended on the transaction cost. SFA stated that a service provider will be providing the PIN authentication service, not the government, and that the government would be paying a “cost neutral” transaction cost to the service provider.</p> <p>Timeframe NCS will be ready for FFEL lenders to use the PIN authentication services by June 30, 2001. Testing will be available by May, and a separate test site will exist. First week of April for specs on SFA PIN site.</p> <p>SFA PIN Use for Other Purposes SFA noted they are open to looking into the idea of allowing FFEL to use the SFA PIN for other lender-servicing processes besides the actual eNote signing. But use would be restricted to Title IV purposes. Servicing could benefit from this authentication service.</p>
Action Items	<ul style="list-style-type: none"> • Distribution of SFA PIN Use specifications and transaction cost estimates by first week of April (NCS Pearson) • Meeting to discuss collaborative industry standards for digital document (SFA/DL and FFEL Community) • Provide inputs to SFA/NCS Pearson on Service Level Agreements (FFEL Community) • Issue eSign Standards to community in a few days (SFA) • Rough time-line of project milestones (NCS)
Next Meetings	None scheduled



Attendees at the 3/13/01 FFEL Community and SFA PIN Use Meeting

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